

EXHIBIT E

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May 21, 2014

VIA ELECTRONIC MAIL

Danielle R. Foley
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Re: *In re Nexium (Esomeprazole) Antitrust Litigation*
Master File No. 12-md-02409-WGY

Dear Counsel:

I write to request that Ranbaxy and Teva supplement their previous responses to plaintiffs' discovery requests in the above captioned litigation. In light of Fed.R.Civ.P. 26(e), Ranbaxy and Teva are under a duty and obligation to supplement their prior production of documents.

Specifically, plaintiffs are not requesting that Ranbaxy and Teva search for supplemental documents pertaining to every request for production. Rather, plaintiffs expect Ranbaxy and Teva to search for any additional documents created after the date of your latest production that are responsive to the below requests for production.¹

Requests to Ranbaxy:

1. Plaintiffs' First Request for Production of Documents to All Defendants ("First RFP"), dated November 21, 2012, nos. 6-9, 11, 20-22,² 24,³ 54-57, 65-68, 70, and 77;
2. Plaintiffs' Second Request for Production of Documents to All Defendants ("Second RFP"), dated May 1, 2013, nos. 1-11,⁴ 13-14, and 17; and
3. Plaintiffs' Third Request for Production of Documents to All Defendants ("Third RFP"), dated July 12, 2013, nos. 3-4, 7, 13-15,⁵ and 30.

¹ Plaintiffs do not waive the right to seek other supplemental productions responsive to their document requests or answers to their interrogatories not addressed in this letter.

² "[A]ny other government body or agency" in First RFP nos. 21-22, and 24 includes the FDA.

³ "[A]ny other government body or agency" in First RFP nos. 21-22, and 24 includes the FDA.

⁴ Plaintiffs seek only documents concerning Generic Nexium in Second RFP no. 5.

⁵ Plaintiffs seek only documents concerning Nexium in Third RFP nos. 13-15.

Requests to Teva:

1. First RFP, nos. 6-9, 11, 20-22, 24, 54-57, 65-68, 70, and 77;
2. Second RFP, nos. 1-5,⁶ 8-11,⁷ 13-14, and 17; and
3. Third RFP, nos. 4, 7, 13-15,⁸ and 30.

Please advise me as soon as possible regarding when Ranbaxy and Teva will produce these documents.

Sincerely,



Chris Letter

cc: Counsel of Record

⁶ Plaintiffs seek only documents concerning Generic Nexium in Second RFP no. 5.

⁷ Plaintiffs seek only documents from Teva concerning the “actual or proposed agreements with Generic Manufacturers or other third parties to ameliorate the effect of” the consent decree or any import ban in Second RFP nos. 8-9.

⁸ Plaintiffs seek only documents concerning Nexium in Third RFP nos. 13-15.